

MARGARET A. MCLEATCHIE, Nevada Bar No. 10931
DAYVID FIGLER, Nevada Bar No. 4264
LEO S. WOLPERT, Nevada Bar No. 12658
MCLEATCHIE LAW
602 South Tenth Street
Las Vegas, Nevada 89101
Telephone: (702) 728-5300; Fax: (702) 425-8220
Email: maggie@nvlitigation.com
Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LANCE DOWNES-COVINGTON, an
individual, SOLDADERA SANCHEZ, an
individual, ROBERT O'BRIEN, an
individual, EMILY DRISCOLL, an
individual, ALISON KENADY, an
individual, TENISHA MARTIN, an
individual, GABRIELA MOLINA, an
individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
SHERIFF JOSEPH LOMBARDO, in his
official capacity as Sheriff of the Las Vegas
Metropolitan Police Department;
LIEUTENANT KURT MCKENZIE, as an
individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
OFFICER TABATHA DICKSON, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer,
UNKNOWN OFFICERS 1-14, as individuals
and in their capacity as Las Vegas
Metropolitan Police Department Officers,

Defendants.

Case. No.: 2:20-cv-01790-GMN-DJA

STIPULATION AND ORDER TO
STAY DISCOVERY AND OTHER
DEADLINES PENDING
SETTLEMENT DISCUSSIONS

FIRST REQUEST

///

///

///

1 Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily
2 Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through
3 their attorneys of record, Margaret A. McLetchie and Dayvid Figler with the law firm of
4 McLetchie Law and Defendants, the Las Vegas Metropolitan Police Department
5 ("LVMPD"), Sheriff Joseph Lombardo, Lieutenant Kurt McKenzie, and Officer Tabatha
6 Dickson (collectively ("LVMPD Defendants")), by and through their attorneys of record,
7 Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach
8 Coffing, (collectively the "Parties") hereby stipulate to the following:

- 9 1. During a recent meet and confer conducted on December 20, 2021,
10 regarding outstanding discovery, the Parties determined that this matter may
11 be appropriate for possible resolution and that a stay of discovery and other
12 deadlines would allow the Parties to explore the possibility of settlement,
13 without incurring the time and expense of ongoing discovery and other work
14 during settlement discussions.
- 15 2. The Parties agree that all deadlines in this matter be stayed for a sixty (60)
16 day period. Parties further agree that within fifteen (15) days after
17 completion of the contemplated settlement discussions, if not successful,
18 the parties will submit a stipulated schedule regarding any pending motions
19 or discovery which will extend all applicable dates for the commensurate
20 time period that they were stayed in accordance with Rule 26 of the Federal
21 Rules of Civil Procedure and Rule 26-1 of the Local Rules of the United
22 States District Court, for the Court's approval.
- 23 3. Accordingly, the Parties hereby agree and request the Court to enter a stay
24 of all deadlines in the instant case.
- 25 4. This is the Parties' first request for a stay of deadlines in this matter.
- 26 5. Notwithstanding the stay, the Parties intend to and hereby agree to
27 cooperate in the exchange of information as needed to facilitate settlement.
28

6. The Parties both submit that the instant stipulation is being offered in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

DATED this 22nd day of December, 2021. DATED this 22nd day of December, 2021.

MCLETSCHIE LAW

MARQUIS AURBACH COFFING

By: /s/ Margaret A. McLetchie

By: /s/ Jackie V. Nichols


Margaret A. McLetchie
Nevada Bar No. 10931
Dayvid Figler
Nevada Bar No. 4264
Leo S. Wolpert
Nevada Bar No. 12658
602 South Tenth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

Craig R. Anderson, Esq.
Nevada Bar No. 6882
Jackie V. Nichols, Esq.
Nevada Bar No. 14246
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for LVMPD Defendants

ORDER

IT IS SO ORDERED.

DATED: December 28, 2021



UNITED STATES MAGISTRATE JUDGE